

# **Redacted Version of Document Sought to Be Sealed**

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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,  
 JEREMY DAVIS, CHRISTOPHER  
 CASTILLO, and MONIQUE TRUJILLO  
 individually and on behalf of all similarly  
 situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

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Case No.: 4:20-cv-03664-YGR-SVK

**DECLARATION OF MARK MAO IN  
 SUPPORT OF PLAINTIFFS'  
 ADMINISTRATIVE MOTION TO  
 SUPPLEMENT THEIR SANCTIONS  
 MOTION**

The Honorable Susan van Keulen

**DECLARATION OF MARK MAO**

I, Mark Mao, declare as follows.

1. I am a partner with the law firm of Boies Schiller Flexner LLP, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of California. I have personal knowledge of the matters set forth herein and am competent to testify.

2. Pursuant to Civil Local Rule 7-11(b), I submit this Declaration in Support of Plaintiffs' Administrative Motion to Supplement their Sanctions Motion. Plaintiffs' proposed supplement is attached hereto as Exhibit A.

3. On December 22, 2021, Plaintiffs Served Interrogatory No. 35, which asked:

[REDACTED]

4. Google served its response to this Interrogatory on January 28, 2022, stating:

[REDACTED]  
[REDACTED] See Exhibit B.

5. On May 12, 2022—over two months after the March 4, 2022 close of fact discovery, and almost one month after the parties' April 15, 2022 deadline to serve opening expert reports, Google amended its response to Interrogatory No. 35. [REDACTED]

[REDACTED]  
[REDACTED]

6. Plaintiffs now respectfully seek leave to submit a supplement to their Sanctions Motion (Dkt. 430), including to address Google's supplemental interrogatory response.

7. My colleague emailed counsel for Google, attaching Plaintiffs' proposed supplement and asking for Google's position on this Administrative Motion. Counsel for Google has not yet taken a position.

8. As a result, Plaintiffs were unable to obtain a stipulation from Google.

9. Attached hereto as **Exhibit A** is Plaintiffs' proposed supplement to their Sanctions Motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 16th day of May, 2022 in San Francisco, California.

DECLARATION OF MARK MAO  
Case No. 4:20-cv-03664-YGR-SVK